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10 *Attorneys for Governor Gavin Newsom*

11
12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 In re:
16 PG&E CORPORATION,
17 -and-
18 PACIFIC GAS & ELECTRIC COMPANY,
19 Debtors.

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

20
21 Affects PG&E Corporation
22 Affects Pacific Gas & Electric Company
23 Affects both Debtors

24 **NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF
PAPERS**

25
26 *All papers shall be filed in the Lead Case,
27 No. 19-30088 (DM)

28
29 **PLEASE TAKE NOTICE** that Governor Gavin Newsom, in his official capacity as
30 Governor of the State of California, but not on behalf of any agency, department, unit or entity of
31 the State of California (the “**Governor**”), as a party in interest in the above-captioned chapter 11

32 CASE NO. 19-30088 (DM)

33 CASE NO. 19-30089 (DM)

1 cases (the “**Chapter 11 Cases**”), by and through his counsel, O’Melveny & Myers LLP
2 (“**O’Melveny**”), hereby enter this appearance pursuant to section 1109(b) of title 11 of the United
3 States Code, 11 U.S.C. §§ 101-1532 (the “**Bankruptcy Code**”), and Rule 9010(b) of the Federal
4 Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and requests that the counsel listed
5 below be added to the official mailing matrix, CM/ECF, and service lists in the Chapter 11 Cases.
6 The Governor requests, pursuant to Bankruptcy Rules 2002, 3017, 9007 and 9010(b), Rule 9010-1
7 of the Bankruptcy Local Rules for the Northern District of California, and Bankruptcy Code section
8 1109(b), that copies of all notices and pleadings given or required to be given in the Chapter 11
9 Cases and copies of all papers served or required to be served in the Chapter 11 Cases, including
10 but not limited to, all notices (including those required by Bankruptcy Rule 2002), reports,
11 pleadings, motions, applications, lists, schedules, statements, and all other matters arising herein or
12 in any way related to the Chapter 11 Cases, including in adversary proceedings, be given and served
13 upon O’Melveny at the following addresses:

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1 mail, telex or otherwise that (i) affects, or seeks to affect, or may potentially affect in any way, any
2 rights or interests of any creditor or party in interest in these Chapter 11 Cases; (ii) affects, or seeks
3 to affect (a) the above-captioned Debtors and/or their estates or (b) property or proceeds thereof in
4 the possession, custody, or control of others that any of the Debtors or their estates may seek to use;
5 or (iii) requires or seeks to require any act, delivery of any property, payment or other conduct by
6 the Governor.

7 **PLEASE TAKE FURTHER NOTICE** that the Governor does not, by filing this Notice
8 of Appearance and Request for Service of Papers nor any subsequent appearance, pleading, proof
9 of claim, claim or suit, submit to the jurisdiction of the Bankruptcy Court or any other court with
10 respect to proceedings, if any, commenced in any case against or otherwise involving the Governor
11 or the Office of the Governor; nor shall it be deemed or construed as a waiver of any right by the
12 Governor or the State of California to (a)(i) have an Article III judge adjudicate in the first instance
13 any case, proceeding, matter or controversy as to which a Bankruptcy Judge may not enter a final
14 order or judgment consistent with Article III of the United States Constitution, (ii) have final orders
15 in non-core matters entered only after *de novo* review by a District Court Judge, (iii) trial by jury
16 in any proceeding so triable in the Chapter 11 Cases or in any case, controversy, or proceeding
17 related to the Chapter 11 Cases, (iv) have the United States District Court withdraw the reference
18 in any matter subject to mandatory or discretionary withdrawal, (v) any and all rights, claims,
19 actions, defenses, setoffs, recoupments or remedies to which the Governor or the State of
20 California, are or may be entitled under agreements, in law or in equity, all of which rights, claims,
21 actions, defenses, setoffs and recoupments are expressly reserved hereby, (vi) the requirements for
22 service of process under Federal Rules of Bankruptcy Procedure 7004 and 9014, or (vii) the
23 requirements for service of an objection to claim under Federal Rule of Bankruptcy Procedure
24 3007, all of which rights, claims, actions, defenses, setoffs, and recoupments the Governor or the
25 State of California expressly reserve or (b) waiver of any objections or defenses that the Governor
26 or the State of California may have to this Court's jurisdiction over the State of California or any
27 agency, unit or entity of the State of California based upon the Eleventh Amendment to the United
28

CASE NO. 19-30088 (DM)
CASE NO. 19-30089 (DM)

- 3 -

NOTICE OF APPEARANCE

1 States Constitution or related principles of sovereign immunity or otherwise, all of which objections
2 and defenses are hereby reserved.

3 Dated: May 15, 2019
4 Los Angeles, California

O'MELVENY & MYERS LLP

5 By: /s/ Jacob T. Beiswenger
6 Jacob T. Beiswenger
7 *Attorneys for Governor Gavin Newsom*

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CASE NO. 19-30088 (DM)
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NOTICE OF APPEARANCE